

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TRANSCEND SHIPPING SYSTEMS LLC,

PLAINTIFF,

vs.

ORIENT OVERSEAS CONTAINER LINE
LIMITED,

DEFENDANT.

Civil Action No. 2:21-cv-00020-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Transcend Shipping Systems LLC and Defendant Orient Overseas Container Line Limited (collectively, “parties”) respectfully file this Joint Motion to Stay All Deadlines and Notice of Settlement. The parties hereby notify the Court that they have reached an agreement in principle to settle this matter. The parties further request that the Court stay all deadlines in this action, including those contained in the Court’s Docket Control Order, for thirty (30) days so that appropriate dismissal papers may be submitted.

Respectfully submitted,

By: /s/ René A. Vazquez

René A. Vazquez
Virginia Bar No. 41988
rvazquez@ghiplaw.com
Randall T. Garteiser
Texas Bar No. 24038912
rgarteiser@ghiplaw.com
M. Scott Fuller
Texas Bar No. 24036607
sfuller@ghiplaw.com
GARTEISER HONEA, PLLC
119 W. Ferguson Street
Tyler, TX 75702
Telephone: (903) 705-7420
Facsimile: (888) 908-4400

*Attorneys for Plaintiff,
Transcend Shipping Systems, Llc*

Respectfully submitted,

By: /s/ David M. Airan

J. Mark Mann
Texas Bar No. 12926150
mark@themannfirm.com
G. Blake Thompson
Texas Bar No. 24042033
blake@themannfirm.com
MT₂ LAW GROUP: MANN TINDEL THOMPSON
201 West Houston Street, Suite 102
Marshall, TX 75670
Telephone: (903) 657-8540
Facsimile: (903) 657-6003

David M. Airan (*pro hac vice*)
Illinois Bar No. 6215687
dairan@leydig.com
Maxwell B. Snow (*pro hac vice*)
IL Bar No. 6322829 / VA Bar No. 88554
msnow@leydig.com
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, IL 60601
Telephone: (312) 616-5600
Facsimile: (312) 616-5700

*Attorneys for Defendant,
Orient Overseas Container Line Limited*

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Defendant, Orient Overseas Container Line Limited conferred with counsel for Plaintiff, Transcend Shipping Systems, LLC concerning the subject matter of this motion. Plaintiff's counsel indicated that Plaintiff agrees to the filing of the motion.

Dated: August 23, 2021

/s/ David M. Airan

David M. Airan (*pro hac vice*)
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, IL 60601
Telephone: (312) 616-5600
Facsimile: (312) 616-5700
dairan@leydig.com

CERTIFICATE OF SERVICE

The undersigned certifies that on August 23, 2021, a true and correct copy of the foregoing document was electronically served on all attorneys of record who have consented to electronic service via the Court's CM/ECF system, as identified in the Notice of Electronic Filing (NEF).

/s/ David M. Airan

David M. Airan (*pro hac vice*)
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza, Suite 4900
180 North Stetson Avenue
Chicago, IL 60601
Telephone: (312) 616-5600
Facsimile: (312) 616-5700
dairan@leydig.com